NEVADA DIVISION OF ENVIRONMENTAL PROTECTION DRAFT FACT SHEET

(Pursuant to NAC 445A.236)

Permittee: Bently Nevada LLC

Permit No.: NEV20005

Facility: Bently Nevada LLC

1631 Bently Parkway South

Minden 89423

Latitude: 38° 00' 22" North Longitude: 119° 45' 40 West

Township 13 North, Range 20 East, Section 27

General: Bently Nevada LLC produces motion sensors for rotating and reciprocating machinery. The company, which was acquired by General Electric on January 23, 2002, has been located in Carson Valley since 1961. The new building at 1631 Bently Parkway South houses all of the company's manufacturing operations and replaces the previous facility located near the Douglas County airport at 1132 Airport Rd. The wastewater discharges subject to this permit correspond to those regulated under the federal pretreatment regulations and consist of discharges from the rinsing steps of the anodize process, the washing process of a wave solder operation, three wet grinders, and a parts washer. The anodize and parts washer discharges are collected in one of three 2000 gal holding tanks for mixing and pH adjustment (if needed) prior to discharge to the Minden Gardnerville Sanitation District collection system. The discharge from the wave solder unit consists of the backwash stream from a closed loop washwater treatment system serving that unit. The wet grinder discharge results from the water stream used as a coolant for that operation. Only one of the three grinders receives significant use and it's cooling water runs through a settling tank prior to discharge to the sewer collection system.

The permit conforms to U.S. EPA regulations governing discharges to publicly owned treatment works. Bently Nevada has consistently met those limits over the years by minimizing any contact of pollutants with the waste stream.

Receiving Water Characteristics: Effluent from the Minden Gardnerville Sanitation District wastewater treatment plant is stored in a reservoir located near the plant prior to irrigation reuse at various sites.

Rationale for Permit Requirements: The pretreatment regulations developed by the U.S. EPA provide a well established method for regulating industrial discharges, and their application is required by Nevada Administrative Code 445A.254. Relevant portions of the U.S. Code of Federal Regulations, Parts 403.5, 433.11, 433.12, and 433.17 are included in Part I.A.1 of the permit. In addition to numerical limits for various parameters there are a series of prohibitions and a certification option for organic

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parameters. pH isn't one of the listed pretreatment parameters but is included here to reflect Bently's practice of adjusting the pH of each 2000 gal holding tank (if needed) prior to discharge. The parameter table is reprinted below.

Table I.A.1.a(1)

Parameter	Discharge Limitations			
mg/l except as noted	Monthly Average	Daily Maximum	Measurement Frequency (1)	
Flow, gpd		4000	continuous	
Cadmium (T) ⁽²⁾	0.07	0.11	twice per year	
Chromium (T)	1.71	2.77	twice per year	
Copper (T)	2.07	3.38	twice per year	
Lead (T)	0.43	0.69	twice per year	
Nickel (T)	2.38	3.98	twice per year	
Silver (T)	0.24	0.43	twice per year	
Zinc (T)	1.48	2.61	twice per year	
Cyanide (T)	0.65	1.20	twice per year	
TTO (3)	-	2.13 (4)	twice per year	
pH, standard units	between 6 and 9		each anodize holding tank discharge (5)	

- (1) Samples shall be collected in accordance with procedures described in the O & M Manual
- (2) T = Total
 (3) Total Toxic Organics, which is the summation of all quantifiable values greater than 0.01 mg/l for the organic chemicals listed at 40 CFR § 433.11(e) - see Appendix

 (4) A certification statement may be submitted instead of analytical data. (Part I.A.1.a(2))
- (5) Each anodize holding tank shall be adjusted for pH, as needed, prior to discharge.

Footnote (4) above is in reference to 40 CFR § 433.12, which allows submittal of a Toxic Organic Management Plan and subsequent certification statements, instead of analytical data.

Schedule of Compliance: An updated O & M manual is due on the three month anniversary of the effective date of the permit.

Procedures for Public Comment: The Notice of the Division's intent to renew discharge permit NEV20005 authorizing discharge of treated wastewater to the Minden Gardnerville Sanitation District collection system, subject to the conditions contained within the permit. is being sent to the **Nevada Appeal** for publication. The notice is being mailed to interested persons on our mailing list. Anyone wishing to comment on the proposed permit can do so in writing for a period of thirty (30) days following the date of publication of the public notice in the newspaper. The comment period can be extended at the

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discretion of the Administrator. The deadline for receipt of all written comments is Thursday, December 4, 2003 by 5:00 pm. Comments postmarked prior to that deadline will also the accepted.

A public hearing on the proposed determination can be requested by the applicant, any affected State or interstate agency, the Regional Administrator, or any interested agency, person, or group of persons. The request must be filed within the comment period and indicate the interest of the person filing the request and the reasons why a hearing is warranted.

Any public hearing the Administrator determines to hold must be conducted in the geographical area of the proposed discharge or any other area the Administrator determines to be appropriate. All public hearings must be conducted in accordance with NAC 445A.238.

The final determination of the Administrator may be appealed to the State Environmental Commission pursuant to NRS 445A.605.

Proposed Determination: The Division has made the tentative determination to renew the proposed discharge permit for a five year term.

Prepared by: Robert J. Saunders

Staff Engineer

Bureau of Water Pollution Control

October 29, 2004

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APPENDIX: TOTAL TOXIC ORGANICS (FROM 40 CFR § 433.11(E))

Acenaphthene Acrolein Acrylonitrile Benzene Benzidine

Carbon tetrachloride (tetrachloromethane)

Chlorobenzene
1,2,4-Trichlorobenzene
Hexachlorobenzene
1,2,-Dichloroethane
1,1,1-Trichloroethane
Hexachloroethane
1,1-Dichloroethane
1,1,2-Trichloroethane
1,1,2-Trichloroethane
1,1,2,2-Tetrachloroethane

Chloroethane

Bis (2-chloroethyl) ether 2-Chloroethyl vinyl ether (mixed)

2-Chloronaphthalene 2-(A,6-Trichlorophenol Parachlorometa cresol Chloroform (trichloromethane)

2-Chlorophenol
1,2-Dichlorobenzene
1,3-Dichlorobenzene
1,4-Dichlorobenzene
3,3-Dichlorobenzidine
1,1-Dichloroethylene
1,2-Trans-dichloroethylene
2,4-Dichlorophenol
1,2-Dichloropropane

1,3-Dichloropropylene (1,3-dichloropropene)

2,4-Dimethylphenol 2,4-Dinitrotoluene 2,6-Dinitrotoluene 1,2-Diphenylhydrazine Ethylbenzene Fluoranthene

4-Chlorophenyl phenyl ether
4-Bromophenyl phenyl ether
Bis (2-chloroisopropyl) ether
Bis (2-chloroethoxy) methane
Methylene chloride (dichloromethane)
Methyl chloride (chloromethane)
Methyl bromide (bromomethane)
Bromoform (tribromomethane)
Dichlorobromomethane
Chlorodibromomethane
Hexachlorobutadiene

Isophorone
Naphthalene
Nitrobenzene
2-Nitrophenol
4-Nitrophenol
2,4-Dinitrophenol
4,6-Dinitro-o-cresol
N-nitrosodimethylamine
N-nitrosodiphenylamine
N-nitrosodi-n-propylamine

Hexachlorocyclopentadiene

Pentachlorophenol

Phenol

Bis (2-ethylhexyl) phthalate Butyl benzyl phthalate Di-n-butyl phthalate Di-n-octyl phthalate Diethyl phthalate Dimethyl phthalate 1,2-Benzanthracene (benzo(a)anthracene)

Benzo(a)pyrene (3,4-benzopyrene)

3,4-Benzofluoranthene (benzo(b)fluoranthene)

11,12-Benzofluoranthene (benzo(k)fluoranthene) Chrysene

Acenaphthylene Anthracene

1,12-Benzoperylene (benzo(ghi)perylene)

Fluorene
Phenanthrene
1.2.5.6 Dibonzanth

1,2,5,6-Dibenzanthracene (dibenzo(a,h)anthracene)

Indeno(1,2,3-cd) pyrene (2,3-o-phenlene pyrene)

Pyrene

Tetrachloroethylene

Toluene

Trichloroethylene

Vinyl chloride (chloroethylene)

Aldrin Dieldrin

Chlordane (technical mixture and metabolites)

4,4-DDT

4,4-DDE (p,p-DDX)
4,4-DDD (p,p-TDE)
Alpha-endosulfan
Beta-endosulfan
Endosulfan sulfate
Endrin
Endrin aldehyde
Heptachlor
Heptachlor epoxide
(BHC-hexachloro-cyclohexane)
Alpha-BHC

Gamma-BHC
Delta-BHC
(PCB-polychlorinated biphenyls)
PCB-1242 (Arochlor 1242)
PCB-1254 (Arochlor 1254)
PCB-1221 (Arochlor 1221)
PCB-1232 (Arochlor 1232)
PCB-1248 (Arochlor 1248)
PCB-1260 (Arochlor 1260)
PCB-1016 (Arochlor 1016)

Toxaphene

Beta-BHC

2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)